

UNITED STATES DISTRICT COURT
FOR THE
DISTRICT OF MASSACHUSETTS

_____)	
DR. THOMAS M. EDSALL, and)	
GRISEL EDSALL)	
Plaintiffs)	Civil Action
)	No. 04-40106-FDS
v.)	
)	
ASSUMPTION COLLEGE,)	
DR. THOMAS R. PLOUGH,)	
DR. JOSEPH F. GOWER, and)	
DR. JOHN F. McCLYMER)	
Defendants)	
_____)	

AFFIDAVIT OF PAUL J. KLEHM, ESQ.

I, Paul J. Klehm, Esq., under oath, depose and state as follows:

1. I am co-counsel to Plaintiffs in the within matter. I have been licensed to practice law within the Commonwealth of Massachusetts since 1992. I was admitted to practice law in the United States District Court for the District of Massachusetts in 1993.

2. I submit the within affidavit in opposition to Defendants' motion to amend their answer to include an additional affirmative defense and Defendants' motion to amend motion to dismiss to include an additional affirmative defense.

3. I have caused to be attached hereto a true and genuine copy of the cover page of the *Assumption College Faculty*

Handbook and Faculty Policy Document and Appendix M "Faculty Grievances" from said handbook which I received from Attorney Darin A. Day, co-counsel to Defendants, on or about August 26, 2004.

Signed under the pains and penalties of perjury this 23rd day of September, 2004.

/s/ Paul J. Klehm
Paul J. Klehm

CERTIFICATE OF SERVICE

I, Paul J. Klehm, hereby certify that I forwarded a copy of the within document to Douglas F. Seaver, counsel to Defendants, Hinckley, Allen & Snyder LLP, 28 State Street, Boston, MA 02109-1775, by first class mail, postage pre-paid on September 23, 2004.

/s/ Paul J. Klehm
Paul J. Klehm